# JEGEG ROCKY FLATS

## INTEROFFICE CORRESPONDENCE

DATE:

July 26, 1991

TO:

J. W. Langman, Env. Mon. and Assess., Bldg. 130B, X5975

FROM:

G. S. Taylor, RCRA Permitting, Bldg. 130C, X3536

SUBJECT:

CLARIFICATION OF DRILL CUTTING WASTE STORAGE TIME - GST-011-91

The attached letter recommends that any waste characterized as hazardous waste should be transferred to a RCRA permitted storage area within a pre-designated time limitation and that this time limitation should be incorporated into the EMAD SOPs that would be submitted to the Colorado Department of Health (CDH) for approval. The suggested time limitation of three days has not been formally approved by CDH.

Since your procedures do not incorporate a specific time period, Permitting & Compliance strongly recommends obtaining formal approval in writing of a time limitation. Unless written approval of a time limitation is obtained, the hazardous waste must be moved <u>immediately</u> to a permitted area upon characterization.

Should you have any further questions regarding this matter, please feel free to contact Glenn Taylor at extension 3536 or Jim Fitzsimmons at extension 6264.

#### GST:aaf

#### Attachment:

a) G. S. Taylor letter to J. W. Langman, (009), Drill Cutting and Decon Pad Operating Procedures, July 8, 1991

### Distribution

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BY G. T. Ostdiek & 20
DATE 7-12-93

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